

EXHIBIT 31

1

2 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

3 -----X

4 MARK I. SOKOLOW, ET AL.,

5 PLAINTIFFS,

6

-against-

Case No:
04CV397 (GBD) (RLE)

7

8 THE PALESTINE LIBERATION ORGANIZATION,
ET AL.,

9

DEFENDANTS.

10 -----X

11

12 DATE: September 5, 2012

13 TIME: 2:26 P.M.

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16 DEPOSITION of LAUREN SOKOLOW,
17 taken by the Defendants, pursuant to Notice
18 and to the Federal Rules of Civil
19 Procedure, held at the offices of Morrison
20 & Foerster, 1290 Avenue of the Americas,
21 New York, New York 10104, before Robert X.
22 Shaw, CSR, a Notary Public of the State of
23 New York.

24

25

1 Lauren Sokolow

2 A. No.

3 Q. Okay. So, on January 27th,
4 2002, prior to the attack that was the
5 result of your injuries, did you see the
6 person or persons who set off the explosion
7 that day, prior to the explosion?

8 MR. SOLOMON: Objection to
9 form, but go ahead.

10 A. Not -- no, not consciously.

11 Q. Okay. Did you see the person
12 or persons who set off the explosion
13 following the explosion itself?

14 A. I saw pictures of her in the
15 newspaper.

16 Q. And who did you see pictures of
17 in the newspaper?

18 A. Wafa Idris.

19 Q. Okay. And how do you know that
20 that was the person that set off the
21 explosion?

22 A. From the news, and from my
23 lawyers.

24 Q. Okay. Did you see Wafa Idris
25 at the scene?

1 Lauren Sokolow

2 A. No.

3 Q. Okay. Do you know which
4 direction the explosion came from?

5 A. No.

6 Q. Did you know if it came from
7 behind you?

8 MR. SOLOMON: Asked and
9 answered.

10 You can answer.

11 A. No.

12 Q. Okay. So, based on your
13 earlier statement, if you saw a picture of
14 Wafa Idris, you could identify that person?

15 MR. SOLOMON: Objection to
16 form.

17 Go ahead.

18 A. I may be able to, if I remember
19 correctly.

20 Q. Is that identification based on
21 anything that you, yourself, saw?

22 A. No.

23 Q. Okay. So, when you say that
24 you could identify her, is it fair to say
25 that your knowledge is based on what other

1 Lauren Sokolow

2 A. One is the Arab Bank.

3 And two is the PA, PLO.

4 Q. Why did you sue the Arab Bank?

5 MR. SOLOMON: Objection.

6 Go ahead.

7 A. Well, I believe that the Arab
8 Bank put money into the Saudi committee,
9 which then aided in terrorism.

10 And the PA, PLO, I believe,
11 gave aid to Al Aqsa and Wafa Idris and, you
12 know, aided with that terrorist attack.

13 Q. Are you aware of any evidence
14 that the Arab Bank had anything to do with
15 the bombing on January 27th, 2002?

16 A. I rely on my lawyers for the
17 evidence. I do.

18 Q. Do you have any personal
19 knowledge that the Arab Bank had anything
20 to do with the bombing on January 27th,
21 2002?

22 MR. SOLOMON: Note my
23 objection. We're talking about your
24 own knowledge.

25 THE WITNESS: Right.

1 Lauren Sokolow

2 MR. SOLOMON: Not necessarily
3 what we've collected; okay?

4 A. Right.

5 I mean, all I know is what I
6 said, that they were putting money into the
7 Saudi committee, which was then aiding in
8 terrorist attacks, giving money to the
9 families of the terrorists.

10 Q. Well, do you think that the
11 Arab Bank caused the bombing that took
12 place on January 27th, 2002?

13 MR. SOLOMON: Objection.

14 Go ahead.

15 A. Well, I think Wafa Idris caused
16 the bombing. I mean, she actually, you
17 know, firsthand, caused it. I think they
18 were aiding, giving money.

19 Q. Okay. So, you were saying, a
20 little earlier, that you sued the
21 Palestinian Authority because you believed
22 that they assisted Wafa Idris?

23 A. Yes.

24 Q. And you also believe that the
25 Palestinian Authority assisted the Al Aqsa

1 Lauren Sokolow

2 Martyrs Brigades?

3 A. Yes.

4 Q. Do you believe that the PLO
5 assisted Wafa Idris?

6 A. To my knowledge, yes.

7 Q. And do you believe the PLO
8 assisted Al Aqsa Martyrs Brigade?

9 A. Yes.

10 Q. Okay. And are you aware of any
11 evidence that the PA had anything to do
12 with the bombing of January 27th, 2002?

13 A. I am not aware of any evidence,
14 I just rely on my parents and my lawyers.

15 Q. Okay. So, is it fair to say
16 that the evidence on which you base your
17 allegations is not from your own personal
18 knowledge?

19 MR. SOLOMON: Objection. Form,
20 and calls for a legal conclusion.

21 But go ahead.

22 A. Right. Yes.

23 MR. SOLOMON: "Right, yes,"
24 that's your answer?

25 A. Yes. That's my answer.

1 Lauren Sokolow

2 MR. SOLOMON: "Yes" is the
3 answer.

4 Q. So, your answer is, it is --
5 I'm going to repeat my
6 question.

7 A. Okay.

8 Q. I asked you if it was fair to
9 say that the evidence on which you base
10 your knowledge is not from your own -- I'm
11 sorry -- that you base your allegations is
12 not from your own personal knowledge?

13 MR. SOLOMON: Note a continuing
14 objection.

15 Answer the question.

16 A. Right.

17 Q. Okay. And you identify your
18 attorneys and your parents as the people
19 who told you, um, that the evidence
20 supports these allegations?

21 MR. SOLOMON: Objection.

22 Go ahead.

23 A. Right.

24 Q. Okay. Earlier in your
25 testimony you mentioned the name of Wafa